

### REMARKS

In response to the final office action dated November 14, 2007, claim 1 is being amended. Claims 9-20 have been withdrawn earlier. As such, claims 1-20 as amended are pending. Favorable consideration of the amended claims is requested.

Claim 1 is amended to specify that each of the first data record, the other first-level data and the second data record have a common relationship to the central data. Moreover, the claim now recites that a modification of the first data record will result in a synchronizing modification of the second data record “but not of a record having the common relationship to the central data that is not associated with the grouping value”.

The amendments are supported by the original claim language and by examples described in the specification. See, e.g., FIG. 3, where the payment infotype 310 includes separate records (304, 306 and 308) that have the same relationship vis-à-vis the person 302. (Spec. 10:27—11:6.) For example, the records all define wage information for the person but they relate to three different work assignments. In the illustrated example, a group is formed for the records 306 and 308 but it does not include the record 304. The infotypes 316, 322 and 326 are other examples of records having common relationships.

No new matter is added.

### **Rejections under section 103**

Claims 1-8 were rejected under § 103(a) as unpatentable over U.S. 20050177587 (Mukundan) in view of U.S. 6,112,209 (Gusack). This rejection is rendered moot by the above amendments, but Applicants are not conceding that the rejection has merit.

Nevertheless, Applicants will point to important differences between the present subject matter and the references of record. One issue addressed by the present subject matter is: when multiple related records exist, how can some of them be distinguished from the others ones so that a modification is synchronized only among the distinguished ones and not among the others? The answer, as recited in present claim 1, is to associate some of the multiple records with a grouping value. Particularly, as claim 1 recites, when a first data record is modified this will

result in a synchronizing modification of a second data record (because they are each associated with the grouping value), but another record that is not associated with the grouping value will not be subject to the synchronizing modification.

None of the references of record, considered alone or in combination, addresses the above issue and does not propose the approach recited in claim 1. Beginning with Mukundan, this reference describes, in the abstract and in paragraphs [0766-0772], that field values can depend on the value of another field. One example described by Mukundan there is that the user fills in a State field and that this determines what values are valid for an associated City field. Mukundan then describes that the State value entered by the user can be forwarded to the server before the user has finished filling out the form (Mukundan refers to this as the “immediate post-when-change feature”). The server, which is aware of the dependencies, can then send back the dependent changes (e.g., the City values that are valid for the selected State). (Mukundan para. [0770].)

However, this does not address how one should distinguish some records from others so that a synchronizing change is made in fewer than all of multiple related records. That is, Mukundan is concerned with dependencies between one field and another, and the related changes in a dependent attribute (e.g., the City field), not with identifying which of several records should get a synchronizing change.

As such, Applicants agree with the Examiner that Mukundan fails to disclose or suggest the grouping value of the present claims. Moreover, Mukundan also fails to disclose or suggest the data model structure that is explicitly recited in the present claims: each of the first data record and the second data record that are grouped together has the same relationship to the central data that connects them (see claim 1).

Gusack, in turn, does not provide the missing subject matter. Gusack describes that each database table in a data set can be assigned a unique domain of unique alphanumeric indicia. See, e.g., Table 2 in Gusack's FIG. 6, which has been assigned the domain 1,000,000,000-1,999,999,999. (Gusack 12:1-54.) From the assigned domain, a unique record indicum (e.g., a unique number) is assigned to each record in Table 2. See, e.g., the numbers in the “L#” column in Gusack's FIG. 6. Records in different tables can be linked to each other through the unique record indicia using “forward” and “backward” index tables. (Gusack FIG. 8.) However, a

linking from one record to another using a unique number for that record does not address the situation of how to distinguish some records from others so that a synchronizing change is made in fewer than all of multiple related records.

First, Gusack fails to disclose or suggest the data model structure of claim 1 that each of the first data record and the second data record have the same relationship to the central data that connects them (e.g., each of them is a payment record for the same employee). For example, Gusack describes that a person can have multiple telephone numbers (FIG. 9) but does not group fewer than all of the phone numbers in any way. Accordingly, this feature of claim 1 is entirely missing from the references of record.

Second, Gusack uses the record indicia that are unique to the respective records (see, e.g., Gusack's FIG. 9 where the index table 911 contains unique indicia from a Names index table and a Phone data table to link the entries to each other. However, these unique indicia cannot be used also with other records, because Gusack requires unique indicia for each one. That is, the values taught by Gusack are not such that the same value can be assigned to another record to include that record in the group. As such, Gusack does not address the issue of how to distinguish some records from others so that a synchronizing change is made in fewer than all of multiple related records. Accordingly, the grouping value of claim 1 is entirely missing from the references of record.

The dependent claims contain further features and are patentable over the references of record at least for the above reasons.

## **Conclusion**

Favorable consideration of the claims as amended is requested.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this

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paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Please apply \$120 for the extension fee and any other charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: 3/13/08

  
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